UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

RINNIGADE ART WORKS, individually and behalf of all others similarly situated,

Plaintiff,

v.

CIVIL ACTION NO. 1:20-CV-10867-IT

THE HARTFORD FINANCIAL SERVICES GROUP, INC.; HARTFORD FIRE INSURANCE COMPANY; AND TWIN CITY FIRE INSURANCE COMPANY,

Defendants.

RINNIGADE ART WORKS' RESPONSE TO MOTIONS TO DISMISS

Plaintiff Rinnigade Art Works ("Plaintiff") respectfully submits this response to The Non-Writing Defendants' Motion to Dismiss (Dkt. #16) and Defendant Twin City Fire Insurance Company's Motion to Dismiss Multistate Class Claims (Dkt. #18) (collectively, the "Motions to Dismiss").

As discussed during the Scheduling Conference held on July 21, 2020 (*see* Electronic Clerk's Notes dated July 24, 2020) (Dkt. # 30), Plaintiff plans to file an amended complaint that will render the pending Motions to Dismiss moot. In accordance with Federal Rule of Civil Procedure 15(a)(1)(B), Plaintiff will file its amended complaint no later than Monday, August 3, 2020. In light of its forthcoming amended complaint, Plaintiff is not required to further respond to the Motion to Dismiss at this time but expressly reserves, and does not waive, any and all of its rights to oppose the Motions to Dismiss and the arguments made in support thereof.

Dated: July 27, 2020

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF on July 27, 2020.

/s/ Patrick J. Sheehan

Patrick J. Sheehan